

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ELIZABETH DE COSTER, *et al.*,

Case No. 2:21-cv-00693-JHC

## Plaintiffs,

V.

AMAZON.COM, INC.,

Defendant.

**STIPULATED MOTION AND ORDER  
REGARDING SEALING OF SPECIAL  
MASTERS ORDERS**

**NOTE ON MOTION CALENDAR:  
September 15, 2025**

DEBORAH FRAME-WILSON, *et al.*

Case No. 2:20-cv-00424-JHC

## Plaintiffs.

V

AMAZON.COM, INC.

### Defendant

CHRISTOPHER B.

CHRISTOPHER BROWN, *et al.*,

**Plaintiffs,**

V<sub>5</sub>

AMAZON.COM, INC.

Defendant.

Case No. 2:22-cv-00965-JHC

1 Pursuant to Local Civil Rules 7(d)(1) and 10(g), the Parties in the above-captioned actions,  
2 by and through their respective undersigned counsel, agree as follows, subject to the Court's  
3 approval:

4 WHEREAS, on July 7, 2025, the Court granted Defendant Amazon.com, Inc.'s Motion to  
5 Appoint a Special Discovery Master to Address Privilege Disputes in the above-captioned actions  
6 and authorized a special master to "enter orders necessary for the prompt and efficient resolution  
7 of any assigned disputes";

8 WHEREAS, on July 9, 2025, the Court granted the Parties' stipulated motion for  
9 appointment of Judge Laporte as special master in the above-captioned actions;

10 WHEREAS, on September 12, 2025, Judge Laporte directed the Parties to file with the  
11 Court the following orders ("Special Master's Orders"):

- 12 a. Special Master's Order Re Clawback Standard;
- 13 b. Special Master's Order Re PL Emergency Deposition;
- 14 c. Special Master's Order Re Second Emergency Deposition;
- 15 d. Special Master's Order Re PL First Submission;
- 16 e. Special Master's Order Re PL Second Submission;
- 17 f. Special Master's Order Re PL Third Submission;
- 18 g. Special Master's Order Re PL Fourth Submission;
- 19 h. Special Master's Order Re PL Fifth Submission;
- 20 i. Special Master's Order Re PL Seventh Submission;
- 21 j. Special Master's Order Re PL Eighth Submission; and
- 22 k. Special Master's Order Re PL Ninth Submission.

23 WHEREAS, the Special Master's Orders quote from or describe in detail information that  
24 has been designated as Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon.

25 THEREFORE, in order to ensure that such materials are treated appropriately under the  
26 applicable protective order, and to reduce burdens on the Court and the Parties pursuant to LCR  
27

1 7(d)(1) and 10(g), the Parties and their respective counsel hereby stipulate and agree to the  
2 following procedure for filing and sealing in connection with the Special Master's Orders, subject  
3 to the Court's approval:

4 1. Pursuant to the agreed-upon procedure and Local Civil Rule 5(h), the Parties will  
5 meet and confer and, as appropriate, file (1) public versions of the Special Masters Orders, with  
6 necessary redactions, and (2) corresponding motion(s) to seal pursuant to LCR 5(g)(3) within 21  
7 days after the filing of the Special Master's Orders provisionally under seal.

8 2. This procedure applies to the Special Master's Orders listed in this stipulation and  
9 any future orders or other documents prepared by the Special Master and filed by the Parties at her  
10 direction which may include Confidential or Highly Confidential-Attorneys' Eyes Only material.

11 IT IS SO STIPULATED.

13 DATED this 15th day of September, 2025.

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*Executive Counsel for the De Coster Class and  
Interim Executive Committee for Plaintiffs and  
the Proposed Classes in Frame-Wilson and  
Brown*

## ORDER

The Court GRANTS the Parties' stipulated motion. The Parties shall have 21 days after the filing of the provisionally sealed Special Masters Orders to (1) file public versions of the Special Master Orders, with necessary redactions, and (2) file corresponding motion(s) to seal pursuant to LCR 5(g)(3). It is further ORDERED that this procedure applies to the Special Master's Orders listed in the parties' stipulated motion and any future orders or other documents prepared by the Special Master and filed by the Parties at her direction which may include Confidential or Highly Confidential-Attorneys' Eyes Only material.

IT IS SO ORDERED this 15th day of September, 2025.

John H. Chun  
John H. Chun  
United States District Judge